From: Rao, Kate

To: Shari.Ring@cadmusgroup.com
Cc: Albright, David; Ho, Yenhung

Subject: Contract No. EP-C-15-022, WA No. 5-90, R9 Tech Support for Implementation of the UIC Program – Clean

Energy Systems - Class VI UIC Permit Application # R9UIC-CA6-FY20-1 [Task 1; Subtask 1.2 - Technical Review

Analysis]

**Date:** Monday, March 8, 2021 4:23:00 PM

Attachments: CES--Response--to--EPA--Tech--Eval--5 Class--VI--UIC--Permit--App--R9UIC-CA6-FY20-1 05mar2021.pdf

Class VI Regional Permit Template.docx

Hi Shari.

Below is a new work initiation request for CES. This TDM is for (1) a technical analysis report evaluating CES's Mar 5 responses to EPA technical comments and (2) a draft permit terms/conditions for the Class VI UIC permit. We are asking for the deliverables 6 weeks from the Kick-Off call. Please work directly with Calvin to set up the Kick-off call meeting.

Please let me know if you have any questions.

Thanks. Kate

Contract No. EP-C-15-022, Workplan Assignment No. 5-90

R9 Tech Support for Implementation of the UIC Program – Clean Energy Systems - Class VI UIC Permit Application # R9UIC-CA6-FY20-1 [Task 1; Subtask 1.2 – Technical Review Analysis]

## **Technical Direction**

**Background:** On February 5, 2021, EPA provided CES with technical evaluation comments on its responses to EPA's previous technical evaluation comments and information requests #1-4. On March 5, 2021, CES provided responses to EPA's comments.

**Action:** Under Task 1, SubTask 1.2, review and provide an <u>evaluation of the CES's Mar 5 responses</u>. If the responses do not provide sufficient information, please provide evaluation and discussion under this technical review TDM.

Based on information available in CES permit application and its responses to EPA's technical evaluation comments and information requests, **draft permit conditions** in accordance to the contents and attachments of EPA Class VI regional permit template. The draft permit conditions must ensure that construction and operation of the proposed Class VI well will comply with all relevant Safe Drinking Water Act regulations at 40 CFR 124, 144, 146, 147, and 148 and protect public health and underground sources of drinking water.

**Deliverable:** Provide **(1)** a technical analysis report evaluating **CES's Mar 5** responses to **EPA** technical comments. The report should include an itemized list of additional information necessary to clarify, modify, or supplement the permit application material, and **(2)** a draft permit terms/conditions for the Class VI UIC permit. Deliverable should be emailed in WORD to Kate Rao and Calvin Ho.

## **Estimated LOE for evaluating CES Responses:** 100 hours

**Schedule:** 6 weeks from the Kick-off call/confirmation of TDM.

**Kick-off Call:** Cadmus to set up a call once TDM is received.

## Material to Review:

- CES's Mar 5 Responses to EPA Technical Review Comments (attached)
- EPA Class VI Regional Permit Template (attached)

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Kate Rao

Groundwater Protection Section (WTR 4-2) USEPA Region 9

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